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*Attorneys for Plaintiff Ashley Parham*

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA**

12 ASHLEY PARHAM, JANE DOE, and  
13 JOHN DOE,  
14 Plaintiffs,  
15 SEAN COMBS, KRISTINA  
16 KHORRAM, SHANE PEARCE,  
17 RUBEN VALDEZ, JOHN  
18 PELLETIER, ODELL BECKHAM JR.,  
19 DREW DESBORDES, JACQUELYN,  
WRIGHT, HELENA HARRIS-SCOTT,  
MATIAS GONZALEZ, BRANDI  
CUNNINGHAM, JANICE COMBS,  
KEITH LUCKS, and JOHN AND  
JANE DOES 1-10,

Case No.: 3:24-cv-07191-RFL

Assigned to Hon. Rita F. Lin

**DECLARATION OF ARIEL  
MITCHELL, ESQ. IN SUPPORT OF  
OPPOSITION TO MOTION FOR  
IMPOSITION OF SANCTIONS  
PURSUANT TO FED. R. Civ. P. 11**

Date:

Time:

Crtrm:

## **DECLARATION OF ARIEL MITCHELL, ESQ.**

I, Ariel Mitchell declare that:

23 1. I am an attorney at law, admitted in the State of Florida and admitted *pro hac vice*  
24 to appear in this case as counsel for the Plaintiffs.

25 2. In or around late October, 2024, I was contacted by two individuals<sup>1</sup> who  
26 purported to have information from third-party witnesses relating to Mrs. Parham's

<sup>28</sup> <sup>1</sup> Those individuals are now referred to as the Jane and John Doe Plaintiffs (“DOES”).

1 assault on March 23, 2018.

2 3. During the period from October 2024 through January 2025, I spoke with these  
3 individuals numerous times. The DOES were offering the information as if it was  
4 coming from third parties.

5 4. I am experienced in dealing with high profile cases involving celebrities and am  
6 well aware that individuals may come forward with information for notoriety or  
7 remuneration. As a result of my experience I was initially suspect of the source and the  
8 information.

9 5. In January 2025, the DOES told me that they were in fact the eyewitnesses to the  
10 events set forth in Ms. Parham's complaint and were not reporting information they had  
11 heard from other individuals. They told me that the reason they were so cryptic at first  
12 was that they were afraid for their safety.

13 6. In an effort to determine what information they had, whether it was truthful and  
14 relevant to Mrs. Parham's case, I undertook an investigation to find corroboration for who  
15 and what they described.

16 7. The DOES sent me several pictures of two individuals in police uniforms that they  
17 claimed were there at the time of Parham's assault. I used those pictures along with  
18 several other pictures of other individuals in security uniforms to prepare a photo lineup.

19 8. I presented the photo lineup to Ms. Parham and asked her if she could identify  
20 anyone in the pictures.

21 9. Ms. Parham only identified one of the individuals, John Pelletier, the police officer  
22 who responded to the neighbor's house following her assault.

23 10. The DOES also told me that another individual, Drew Desbordes, was also present  
24 at the time of the assault.

25 11. I again did a similar lineup of several other individuals of similar size and  
26 skin-tone as Mr. Desbordes. Ms. Parham identified Mr. Desbordes from that lineup and  
27 told me that he was the person during the assault who used her body like a "Slip-N-Slide"  
28 during the assault.

1     12.   The DOES told me Odell Beckham was there at the time of the assault.  
2     Specifically, they told me that Mr. Beckham was being called by his middle name,  
3     Cornelius.

4     13.   Following my conversation with the DOES, I called Ms. Parham and gave her a  
5     series of names, not using Odell's first name but his middle name Cornelius, as well as a  
6     series of other names that were randomly chosen. Parham said she remembered hearing  
7     the name Cornelius because she thought it was a funny, silly and unusual name.

8     14.   When I showed Parham a picture of Mr. Beckham, Parham said that his body type  
9     looked familiar, but she had a solid memory of the name Cornelius being used.

10    15.   In an effort to insure that my investigation was thorough and not influenced or  
11    tainted by any contact between the DOES and Parham, I made sure that the DOES and  
12    Parham have never spoken directly to one another, nor have they met. They are complete  
13    strangers and did not know each other prior to the date and time when the assault  
14    occurred.

15    16.   I conducted lineups to ensure that I went beyond due diligence and it was only  
16    after several occurrences of Parham identifying the same individuals, without knowledge  
17    of what was being said by the DOES that I came to the conclusion that all parties were  
18    being truthful, and that all parties were in fact at the same place, on the same date, and  
19    that the individuals they were alleging to have been there were in fact there.

20    17.   Since the filing of Defendant's motion, Defendant has been using the media to  
21    manipulate the potential jury pool with false representations to the media regarding the  
22    efficacy of Plaintiff's complaint.

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28    18.   The following two links are from the TMZ website. The first is titled "Punish

1 Accuser's Lawyers. Judge!!! Huge Holes in Story, They Should've known."  
2 <https://www.tmz.com/2025/05/09/druski-accusers-lawyers-huge-holes-rape-claims/> . The second is an  
3 article discussing the phone and bank records that were disclosed in Defendant's motion  
4 that they now want administratively sealed.

5 <https://www.tmz.com/2025/04/21/druski-bank-account-balance-phone-records-diddy-lawsuit/>

6 19. On multiple occasions, I have inquired with counsel for Defendant Desbordes to  
7 waive service which went unanswered. Instead, Defendant filed his sanctions motion  
8 despite the fact he has yet to be served or yet to waive service.

9 Executed this 22<sup>nd</sup> day of May, 2025, under penalty of perjury at Miami, Florida.

10 *Ariel Mitchell*

11 ARIEL MITCHELL, ESQ.  
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